

SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.
P.O. Box 555
Escalante, Utah 84726

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: CC Docket No. 94-102,
95 Percent ALI-Capable Handset Penetration Requirement
Rule Section 20.18(g)(1)(v).

Eighth Quarterly Report

Dear Ms. Dortch:

South Central Utah Telephone Association, Inc. (South Central), a rural area telephone cooperative, is a small, Tier III PCS licensee, as defined in the Commission's E-911 *Order to Stay*, FCC 02-210, released July 26, 2002. South Central serves the St. George, Utah BTA on the PCS F-block spectrum (station KNLG223) and utilizes Nortel Networks' CDMA equipment for its PCS network. On October 5, 2004, South Central completed its acquisition of a partitioned portion of Qwest Wireless, LLC's E-Block PCS license for the Salt Lake City-Ogden, Utah BTA (station WQBL704). The partitioned area consists of Piute County, Utah and portions of Sevier and Wayne Counties, Utah.

There are seven Public Safety Answering Points (PSAPs) in South Central's current service area, including St. George, Utah (serving Washington County); Panguitch, Utah (serving Garfield County); Sevier, Utah (serving Piute, Sevier and Wayne Counties); Colorado City, Arizona (serving Hildale, Utah); Kanab, Utah (serving Kane County); Cedar City, Utah (serving Iron County and part of Washington County); and Beaver, Utah (serving Beaver County).

By *Order (CC Docket No. 94-102)*, FCC 06-36, released March 17, 2006 (the "*Order*"), the Commission granted South Central an extension of time, up to and including March 17, 2007, within which to comply with the Rule Section 20.18(g)(1)(v) requirement that it achieve a 95 percent penetration level of ALI-capable handsets among its PCS subscribers. In a filing on March 22, 2007, South Central reported to the Commission that it had reached and surpassed the 95 percent benchmark by the March 17, 2007 deadline.

The instant report is submitted pursuant to the requirements of Paragraph No. 19 of the *Order*, and is as follows:

Item 1: The number and status of E-911 Phase II requests from Public Safety Answering Points (“PSAPs”), including those requests that the Filer may consider invalid: As previously reported, South Central has received requests from the following PSAPs: Garfield County Sheriff’s Office, Beaver County Sheriff’s Office Dispatch, Cedar City Consolidated Communications Center and Richfield Consolidated Dispatch Center at Sevier, Utah. Since the last report, a request was received (on November 13, 2007) from St. George Consolidated Communications Center, the PSAP for Washington County.

Item 2: The dates on which E-911 Phase II service has been implemented or will be available to the PSAPs served by the Filer’s system: The in-service dates are as follows: Cedar City Consolidated Communications Center – December 7, 2006; Garfield County Sheriff’s Office – January 30, 2007; Beaver County Sheriff’s Office Dispatch –February 5, 2007. The request from the Sevier County PSAP was satisfied on November 26, 2007. We plan to have Washington County in service by April 2008.

Item 3: The status of the Filer’s coordination with PSAPs for alternative 95% ALI-capable handset penetration dates: The above PSAPs have been advised that we have achieved 95% penetration. As we receive additional PSAP requests for Phase II service, we will likewise make those PSAPs aware of our level of penetration at the time.

Item 4: The Filer’s efforts to encourage customers to upgrade to ALI-capable handsets: We continue to encourage our customers to upgrade to ALI-capable handsets. Our efforts include:

- Posting on our Internet site an explanation of location-capable handsets and the benefits of upgrading. The posting includes a list of the non-ALI-capable handsets that we sold prior to 2003 so that our customers will be able to determine whether their particular handsets need upgrading.
- Continuing to offer a discount on new handsets to customers with non-ALI-capable handsets who wish to upgrade (very few are left that have not upgraded).

Item 5: The percentage of the Filer’s customers with ALI-capable phones:

As of December 31, 2007, our level of penetration of location-capable handsets remained at 96.1%.

Item 6: Until the Filer satisfies the 95% penetration requirement, detailed information on the Filer's status in achieving compliance, and whether the Filer is on schedule to meet the revised, June 30, 2006, deadline: No longer applicable in view of the fact that we have already satisfied the 95% penetration requirement.

Very truly yours,

South Central Utah Telephone Association, Inc.

By:



Brant Barton
Chief Executive Officer and
General Manager

Dated: February 1, 2008

Inquiries concerning this filing should be referred to:

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